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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CLARISA CORCHADO,)	Case No. 1:21-cv-00213-BAK
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	(ECF No. 22)
)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 14-day extension of time, from March 18, 2022 to April 1, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Counsel for the Plaintiff requests this extension in good faith. Counsel has an orthopedic surgery scheduled for March 17, 2022 and will need additional time for recovery. Counsel will also be engaged in ongoing physical

1 therapy but requests this short 14-day extension with the anticipation of completing the brief by
2 the proposed due date.

3 Additionally, Ms. Dolly Trompeter, another attorney with the firm, continues to work
4 from Texas as she is still tending to her ill father. As a result, the undersigned has taken on
5 additional matters compounding the need for an additional extension.

6 Plaintiff respectfully states that the requested extension is necessary due several merit
7 briefs being due on the same week. Counsel requires additional time to brief the issues
8 thoroughly for the Court's consideration. Defendant does not oppose the requested extension.
9 Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

10
11 Respectfully submitted,

12 Dated: March 8, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

13
14 By: /s/ Jonathan Omar Pena
15 JONATHAN OMAR PENA
16 Attorneys for Plaintiff

17 Dated: March 8, 2022 PHILLIP A. TALBERT
18 United States Attorney
19 LISA A. THOMAS
20 Regional Chief Counsel, Region VII
21 Social Security Administration

22 By: */s/ Meghan J. McEvoy
23 Meghan J. McEvoy
24 Special Assistant United States Attorney
25 Attorneys for Defendant
26 (*As authorized by email on March 8, 2022)
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ORDER

Based on the above stipulation (ECF No. 22), IT IS ORDERED that Plaintiff shall file Plaintiff's opening brief no later than April 1, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **March 9, 2022**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE